

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS  
BOSTON DIVISION

BOSTON TAXI OWNERS ASSOCIATION, INC. }  
RAPHAEL OPHIR AND JOSEPH PIERRE }  
PLAINTIFFS }

v. }

CITY OF BOSTON, MASSACHUSETTS, }  
WILLIAM EVANS, BOSTON POLICE }  
COMMISSIONER, ANGELA M. O'CONNOR, }  
CHAIRMAN, JOLETTE A. WESTBROOK, }  
COMMISSIONER, ROBERT HAYDEN, }  
COMMISSIONER, }  
DEPARTMENT OF PUBLIC UTILITIES, }  
STEPHANIE POLLACK, TRANSPORTATION }  
SECRETARY, MASSACHUSETTS }  
DEPARTMENT OF TRANSPORTATION, }  
DEFENDANTS }

Civil Action No.: 1:15-cv-10100-NMG

**PLAINTIFF'S MOTION FOR LEAVE TO FILE SECOND AMENDED COMPLAINT**

Plaintiff, Boston Taxi Owners Association, Inc., pursuant to Fed.R.Civ.P. 15(a)(2), moves the Court for leave to file a Second Amended Complaint adding Stephen Goldberg as a Plaintiff. A copy of the proposed Second Amended Complaint is attached hereto as Exhibit A.

In support of this motion, Plaintiff states as follows:

1. At the time this suit was filed, Raphael Ophir was the owner of several taxi medallions.
2. Raphael Ophir died on January 3, 2016.
3. Sharon Ophir, Raphael Ophir's daughter was appointed Personal Representative of his Estate on March 10, 2016.
4. On May 3, 2016, Plaintiff filed a Suggestion of Death and Motion for Substitution of

*Motion allowed. s/SM Gorton, USDJ 7/15/16*